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VIA ECF

Honorable Alison J. Nathan
 United States District Judge
 United States District Court
 Southern District of New York
 40 Foley Square
 New York, New York

Re: *Mohamed Farghaly v. Potamkin Cadillac-Buick-Chevrolet-Geo, Ltd., et al.*
S.D.N.Y. Civil Action No.: 18-CV-11106 (AJN)

Dear Judge Nathan:

We represent the Defendants in the above referenced matter. The Parties are scheduled to complete expert discovery by July 29, 2020. The Parties' Joint Pre-Trial Report is currently due on August 10, 2020. There is a Settlement Conference scheduled before Judge Moses on August 11, 2020. This matter is currently scheduled to begin trial on January 19, 2021. We write jointly with Plaintiff's counsel to request a sixty (60) day extension of the deadline to file the Joint Pre-Trial Report until October 12, 2010.

SO
 ORDERED.

The reason for the request is due, in part, to the fact that the Parties have met with some delay in coordinating a date for the depositions of Plaintiff's experts due to the timeline of Defendant's experts review of Plaintiff's expert materials and Plaintiff's expert availability for deposition in light of patient treatment schedules. With the Court's approval of an extension, the Parties anticipate that those depositions will be completed by September 3, 2020.¹

SO ORDERED.	7/28/20
Alison J. Nathan, U.S.D.J.	

¹ The Parties are simultaneously filing a joint request to Judge Moses for an extension of the expert discovery deadline from July 29, 2020 to September 3, 2020.

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The extension of the Pre-Trial Report submission deadline will not impact the future Settlement Conference or Trial dates.

Respectfully submitted,

KAUFMAN BORGEEST & RYAN LLP



Laura B. Juffa

cc: (via ECF)

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